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BY ECF

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## ON CONSENT OF ALL INTERESTED PARTIES

March 1, 2024

Honorable John P. Cronan
United States District Court for the Southern District of New York
Daniel Patrick Moynihan United State Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: GGC International Limited v. Roger Ver, et al., No. 1:24-cv-01533 (S.D.N.Y.)

Dear Judge Cronan:

Counsel for Third-Party Defendants Digital Currency Group, Inc. and Barry Silbert (collectively, the "DCG Defendants") respectfully submit this unopposed letter motion to extend the time for the DCG Defendants and Michael Moro (collectively, "Third-Party Defendants") to answer, move, or otherwise respond to the Third-Party Complaint in the above-referenced action (the "Action") until March 29, 2024.

On December 29, 2024, Third-Party Plaintiff Roger Ver filed the Third-Party Complaint in the Supreme Court of the State of New York, County of New York (Case No. 151710/2023). *See* Dkt. No. 1, Ex. Q. Counsel for the Third-Party Defendants agreed to accept service of the Third-Party Complaint on January 29, 2024. On February 28, 2024, the DCG Defendants timely filed a notice of removal of this Action to this Court. *See* Dkt. No. 1. Pursuant to Fed. R. Civ. P. 81, the current deadline for Third-Party Defendants to answer, move, or otherwise respond to the Third-Party Complaint is March 6, 2024.

On February 29, 2024, counsel for Mr. Ver consented to the extension of the Third-Party Defendants' time to respond to the Third-Party Complaint to March 29, 2024. The DCG Defendants therefore respectfully request that the Court extend the time for the Third-Party Defendants to answer, move, or otherwise respond to the Third-Party Complaint until March 29, 2024.

This is the Third-Party Defendants' first request for an extension of time. The requested extension does not affect any other scheduled dates set forth in any Court order, as the Court has not yet issued any such orders. An extension of time will best serve the interests of judicial economy and efficiency, and there will be no prejudice to the parties if the extension is granted, as it will not delay or interrupt the orderly progression of this Action.

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## Respectfully Submitted,

## /s/ Caroline Hickey Zalka

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